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**King County Regional Communications Board**

c/o Bill Schrier, Chair  
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29 November 2006

Federal Communications Commission  
Washington, DC 20554

SUBJECT: Proposed Rule Making No. 11348  
Reallocation of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) from  
Commercial  
Use  
Assignment of 30 MHz of 700 MHz Spectrum (747-762/777-792 MHz) to the Public  
Safety Broadband Trust for Deployment of a Shared Public Safety/Commercial  
Next Generation Wireless Network

The Regional Communications Board of King County, State of Washington, submits the following comments regarding this proposed rulemaking:

The present plans for use of 700 MHz spectrum allocate such spectrum only for narrowband. Such frequency assignments are usable only for voice and lower-speed ("wideband") data communications. Increasingly, however, public safety agencies deploy computer and video equipment to field units. These technologies require much higher wireless network speeds and "broadband" spectrum allocations. Such broadband public safety spectrum has not, heretofore, been allocated in the 700 MHz band. The proposed reallocation of 30 MHz would materially assist public safety agencies nationwide by improving communications using these newer technologies.

The King County Regional Communications Board (KCRCB) supports the concept of a public safety broadband trust approach as it would provide access to critically needed additional broadband spectrum for public safety use, facilitate the rapid, cost-effective deployment of network infrastructure, and do so through a process controlled and directed by public safety.

The KCRCB agrees that public/private partnerships may very well be required to facilitate rapid, cost-effective use of this spectrum. But the ultimate control of the spectrum must remain with public safety to ensure that the network meets public safety's technical, operational, and budgetary requirements. These include specifications for coverage, reliability, survivability, functionality, and on-demand access. Critical first responder communications should not be dependent solely upon the business plans, successes, or failures of commercial providers.

The people of King County, Washington, taxed themselves in 1992 to build a public safety voice radio network which serves virtually every police, fire and emergency medical agency in this County of 1.7 million people. But new threats of terrorism and major earthquakes in the Puget Sound region require new technology and tools. These, in turn, require secure, redundant,

high speed, wireless broadband communications networks. And such networks require spectrum assignments which this re-allocation would provide.

We urge Congress and the Commission to take necessary steps to facilitate and provide further definition to this approach.

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